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THE HONORABLE THOMAS S. ZILLY

## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

**EXPERIENCE HENDRIX, LLC**, a Washington Limited Liability Company, and **AUTHENTIC HENDRIX, LLC**, a Washington Limited Liability Company.

No. C-09-0285 TSZ

DEFENDANTS' OBJECTIONS TO PROPOSED JURY INSTRUCTIONS

Plaintiffs,

٧.

HENDRIXLICENSING.COM, LTD dba HENDRIX ARTWORK and HENDRIXARTWORK.COM, a Nevada Corporation, and ANDREW PITSICALIS and CHRISTINE RUTH FLAHERTY, husband and wife,

Defendants.

COMES NOW Defendants Pitsicalis et al (hereafter "Pitsicalis") to offer their objections to the proposed jury instructions.

Pitsicalis only raises one possible issue with the Court's proposed jury instructions and verdict form; namely, they appear to make no inquiry as to the jury's finding of various theories of damages being applicable to Defendant Andrew Pitsicalis personally, the Defendant corporation, or some combination thereof. If it is the Court's opinion that this is a question of law for the Court post any verdict, as opposed to a question of fact for the jury, then the objection is withdrawn.

DEFENDANTS' OBJECTIONS TO PROPOSED JURY INSTRUCTIONS- 1 of 1

Osinski Law Offices, P.L.L.C. 535 Dock St. Suite 108, Tacoma, Washington 98402 Tel (253) 383-4433 | Fax (253) 572-2223 | tto@osinskilaw.com

1 SUBMITTED this 2<sup>nd</sup> day of May, 2011. 2 3 4 OSINSKI LAW OFFICES, P.L.L.C. 5 By /s/ Thomas T. Osinski Jr 6 Thomas T. Osinski Jr., Esq. Attorney for Defendants 7 WSBA #34154 8 Osinski Law Offices PLLC 535 Dock Street, Suite 108 9 Tacoma WA 98402 Tel: 253.383.4433 10 Fax: 253.572.2223 Email: tto@osinskilaw.com 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26